Senate
Impeachment Court
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Atty. RENATO N. BANTUG JR.
Clerk of the Impeachment Court

REPUBLIC OF THE PHILIPPINES
SENATE
IMPEACHMENT COURT

IN THE MATTER OF:

IMPEACHMENT TRIAL OF
VICE PRESIDENT
SARA ZIMMERMAN DUTERTE

CASE NO. 004-2026

COMPLIANCE and MANIFESTION
- with -
REQUEST FOR SPECIFICATION

The Prosecution, in compliance with the directives during the Pre-Trial Conference held on June 18, 2026, respectfully states:

I.
COMMENTS ON RESPONDENT'S PROPOSED STIPULATIONS

1.1. Unless expressly admitted herein, the Prosecution specifically denies each and every allegation, statement, characterization, conclusion, inference, and purported legal effect contained in respondent's proposed stipulations. Any admission is strictly limited to the fact stated and is without prejudice to the Prosecution's position on the propriety, relevance, admissibility, legal effect, and surrounding circumstances thereof.

1.2. The Prosecution's comments on respondent's proposed stipulations are as follows:

Par.	Proposed Stipulation (Defense)	Comment
1	On August 22, 2022, the Office of the Vice President wrote to then-Secretary of the Department of Budget and Management, Amenah Pangandaman, expressing its "gratitude for the recommendation	Admitted only insofar as it states that the Office of the Vice President ("OVP") wrote then Department of Budget and

	on the recalibrated budget level under the FY 2023 National Expenditure Program".	Management ("DBM") Secretary Amenah Pangandaman.
2	In that same Letter, the OVP likewise requested a total of ₱403.46 Million for various purposes "to ensure continuous operations of the OVP under the current year".	Admitted only insofar as it states that the OVP requested a total of ₱403.46 Million for various purposes.
3	In said August 22, 2022 Letter to the DBM, the OVP also requested confidential funds in the amount of ₱250 Million "for and in consideration of the safe implementation of the various projects and activities under the Good Governance program and the conduct of official engagements and functional representation in international and domestic events as instructed by the President".	Admitted.
4	On September 15, 2022, the DBM sent a Letter to the OVP addressed to Usec. Zuleika Lopez, Chief of Staff of the OVP, and signed by Maria Grace Delos Santos, Director IV, BMB-C, requesting the OVP for the submission of the following documents: a. Interim/financial accountability report. Based on the submitted Statement of Appropriations, Allotments, Obligations, Disbursements and Balances (FAR No. 1) as of June 30, 2022, out of OVP's FY 2022 allotment of ₱343.970 Million for financial assistance/subsidy, ₱198.297 Million remains unobligated. b. Assumptions and computations used in the proposed augmentation of the financial assistance/subsidy amounting to ₱144.720 Million;	Admitted only insofar as it states that the DBM sent a letter to the OVP addressed to Usec. Zuleika Lopez, Chief of Staff of the OVP, requesting for the submission of the Physical and Financial Plan.

<table>
<tr><td></td><td>c. Physical and financial plan for the proposed Confidential Funds pursuant to Item 4.2 of the COA-DBM-DILG-GCG-DND Joint Circular No. 2015-01 dated January 8, 2015.</td><td></td></tr>
<tr><td>5</td><td>On September 19, 2022, the OVP wrote a Letter to the DBM addressed to Dir. Delos Santos in response to her Letter dated September 15, 2022, submitting the (a) Financial Accountability Report as of August 31, 2022; (b) Copy of the submitted computation in forecasting the requirement for medical assistance; and (c) Physical and Financial Plan, as prescribed under COA-DBM-DILG-GCG-DND Joint Circular No. 2015-01 dated January 8, 2015.</td><td>Admitted only insofar as it states that the OVP wrote a letter to the DBM addressed to Dir. Delos Santos and the submission of the Physical and Financial Plan.</td></tr>
<tr><td>6</td><td>On October 18, 2022, the then-Secretary of the DBM, Pangandaman, issued a Memorandum for the President thru the Executive Secretary, recommending the approval of the OVP request in the amount of ₱221.424 Million, chargeable against the Contingent Fund under the FY 2022 GAA, RA No. 11639, to cover the following Maintenance and Other Operating Expenses Items:
<table><tr><th>Particulars</th><th>Amount ('000)</th></tr><tr><td>Financial Assistance/Subsidy</td><td>96,424</td></tr><tr><td>Confidential Fund</td><td>125,000</td></tr><tr><td>Total</td><td>221,424</td></tr></table></td><td>Admitted only insofar as it states that the DBM issued a Memorandum recommending the approval of the OVP request in the amount of ₱221.424 Million.</td></tr>
<tr><td>7</td><td>In recommending the amount of ₱125 Million in CF for the OVP, the former DBM Secretary Pangandaman stated in paragraph 2.3.3 of her Memorandum for the President dated October 18, 2022 that "the proposed CF covers the</td><td>Denied.</td></tr>
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	safe implementation of OVP's programs and projects for the 2nd semester of FY 2022. However, considering that the first half of the semester is already over, we are only recommending ₱125 Million to cover the requirement for the last quarter of the year".	
8	On November 28, 2022, the Office of the President approved the recommendation of the DBM for the release of ₱221,424,000 to cover the following MOOE Items: (a) Financial Assistance/Subsidy - ₱96,424,000, and (b) Confidential Fund - ₱125,000,000, through a Memorandum from the Executive Secretary and signed by the former Executive Secretary Lucas Bersamin by order of the President.	Denied.
9	On December 13, 2022, the DBM issued Special Allotment Release Order No. SARO-BMB- C-22-0012004 signed by then-Secretary Pangandaman, in the amount of ₱221,424,000 to cover the Financial Assistance/Subsidy and CF per approval of the Office of the President dated November 28, 2022.	Admitted only insofar as to the existence of the Special Allotment Release Order No. SARO-BMB-C-22-0012004.
10	Said SARO No. SARO-BMB-C- 22-0012004 notes on its first page that "the allotment herein released shall be valid for obligation until December 31, 2023".	Denied.
11	On December 20, 2022, the cash advance for the requested CF was released under Land Bank of the Philippines Check No. 244027 in the amount of ₱125,000,000.00.	Admitted.
12	On January 10, 2023, the OVP submitted to the Intelligence and Confidential Funds Office the Liquidation Report and its supporting documents for	Denied.

	liquidation for the confidential expenses of the OVP for the period from December 21 to 31, 2022.	
13	On January 13, 2023, the OVP submitted an Accomplishment Report to the Office of the President and the Speaker of the HOR.	Denied.
14	On January 16, 2023, the OVP submitted an Accomplishment Report to the Senate President.	Denied.
15	On January 17, 2023, the OVP submitted a liquidation report with the Commission on Audit.	Denied.
16	On October 4, 2023, the OVP received the Audit Observation Memorandum No. 2023-211 dated September 14, 2023, and AOM No. 2023- 213 dated October 3, 2023.	Admitted.
17	In response to the AOM Nos. 2023-211 dated September 14, 2023 and 2023-213 dated October 3, 2023, the OVP submitted a letter to the COA-ICFAO on October 19, 2023.	Admitted.
18	On November 30, 2023, the OVP submitted a supplemental letter to COA-ICFAO relative to AOM Nos. 2023-211 dated September 14, 2023 and 2023-213 dated October 3, 2023, "to further explain the propriety, validity, and regularity of all transactions related to said cash advance".	Admitted.
19	On December 13, 2023, COA-ICFAO issued the Notice of Suspension No. 2023-001 suspending the entire ₱125M in audit, which Notice was received by the respondent on December 14, 2023.	Admitted, only insofar as the issuance of the Notice of Suspension for the entire ₱125M.
20	On March 13, 2024, the OVP submitted a Letter-Response to said NS.	Admitted.

21	On March 22, 2024, the OVP submitted a supplemental letter to the COA-ICFAO.	Denied.
22	On August 9, 2024, the respondent and Gina Acosta received the Notice of Disallowance No. 2024-002-100 (2022) dated August 8, 2024 disallowing the amount of ₱73,287,000 in confidential expenses of the OVP.	Admitted.
23	Miss Julieta Villadelrey, OVP Chief Accountant, received a copy of said ND on August 12, 2024.	Admitted only insofar as it states that Julieta Villadelrey is the OVP Chief Accountant.
24	On February 5, 2025, the respondent, Acosta, and Villadelrey, filed an appeal of said ND through a Petition for Review with the COA Commission Proper seeking to reverse and set aside the Notice of Disallowance No. 2024-002-100 (2022) dated August 8, 2024.	Admitted.
25	On April 22, 2026, the respondent, Acosta, and Villadelrey, received the COA Decision No. 2026-171 dated April 10, 2026.	Denied.
26	On May 21, 2026, the respondent, Acosta, and Villadelrey filed a Motion for Reconsideration of the COA Decision No. 2026-171 dated April 10, 2026.	Denied.
27	Said MR is still pending to this day.	Denied.
28	Prior to the respondent's receipt of the COA Decision No. 2026-171 on April 22, 2026, Atty. Gloria Camora appeared before the HOR Committee on Justice publicly disclosing said COA Decision.	Denied.
29	The COA-ICFAO did not issue any NS or ND on the confidential expenses of the Department of Education for 2023, during the term	Denied.

	of respondent as its Department Secretary.	
30	The COA-ICFAO issued Credit Notice No. 2024-162 dated August 8, 2024 for the DepEd confidential expenses covering the period February 20 to March 30, 2023 and April 20 to June 29, 2023, in the total amount of ₱75 Million.	Denied.
31	The HOR-Committee on Justice did not provide the respondent with copies of various documents (Annexes "A" to "FFFFF" of the Articles of Impeachment) prior to its committee hearing on April 14, 2026.	Denied.
32	Various documents were not attached either to the Saballa or Cabrera Complaints (Annexes "A," "J" to "Y," "CC" to "II," "KK" to "NN," "PP" to "SS," "A^3" to "J^3," "L^3" to "O^3," "Q^3" to "T^3," "Z^3" to "A^4," "F^4," "J^4," "L^4," "N^4," "P^4" to "S^4," "W^4" to "F^5")	Denied.
33	The respondent filed her Statements of Assets, Liabilities, and Net Worth for the year 2022.	Admitted.
34	The respondent filed her SALN for the year 2023.	Admitted.
35	The respondent filed her SALN for the year 2024.	Admitted.
36	The respondent filed her SALN for the year 2025.	Admitted.
37	The respondent was not in public office in 2013, 2014, and 2015.	Admitted.
38	The respondent was not holding any impeachable office from 2007 to 2009 since she was the then-Vice Mayor of Davao City.	Denied. The proposed stipulations are not proper subjects of stipulation as they constitute legal conclusions on whether respondent's positions
39	The respondent was not holding any impeachable office from 2010 to 2012	

	and from 2016 to 2021 since she was the then-Mayor of Davao City.	are impeachable offices, which is a matter of constitutional interpretation reserved for the Impeachment Court.
40	As of the date of the filing of the Impeachment Complaints against the respondent, no case was filed nor investigations conducted against the respondent in relation to any of her SALNs.	Denied.
41	The HOR-Committee on Justice did not provide the respondent copies of documents (Annexes "K[8]" to F[9]" of the Articles of Impeachment) prior to its committee hearing on April 22, 2026.	Admitted only insofar as it states that certain documents were not furnished to respondent at the time indicated in the proposed stipulation, as the same were not yet in the custody or possession of the Prosecution, having been obtained only through *subpoena* and during the course of the proceedings; at any rate, the the subject documents were subsequently made available, with copies duly furnished to and accessed by respondent during subsequent stages, rendering any suggestion of continuing non-furnishing or lack of access inaccurate.
42	Certain documents (Annexes "G[5]" to "E[9]" of the Articles of Impeachment) were not attached either to the Saballa or Cabrera Complaints.	
43	Former Usec. Gloria Jumamil-Mercado, Human Resource and Organizational Development Head of Procuring Entity of the Department of Education requested the respondent who was the-then Secretary of Education for	Admitted only insofar as it states that Usec. Gloria Jumamil-Mercado was the Human Resource and Organizational Development Head of

	endorsement of her Application for Retirement to the Office of the President through Memorandum OM-OUHROD-2023- 1554 dated October 16, 2023.	Procuring Entity of the DepEd.
44	On the same day, October 16, 2023, Mercado wrote a Letter to President Ferdinand Marcos, Jr. requesting the latter's approval of her application for retirement effective November 1, 2023.	Denied.
45	The following day, or on October 17, 2023, the respondent wrote a Memorandum for Pres. Marcos Jr. through the then-Executive Secretary Bersamin regarding said application for retirement of Mercado.	Denied.
46	Atty. Reynold Munsayac was appointed as Assistant Secretary for Procurement of the DepEd on October 1, 2023.	Denied.
47	On November 20, 2024, upon motion of then-Representative France L. Castro, the Committee on Good Government and Public Accountability (CGGPA, also known as the QuadComm) of the HOR - 19th Congress cited in contempt Usec. Atty. Zuleika Lopez, Chief of Staff of the Office of the Vice President.	Admitted.
48	During the November 20, 2024 hearing, Rep. Joel Chua instructed the Sergeant-at-Arms to assign a room within the HOR premises where Atty. Lopez was to be detained for five (5) days.	Denied.
49	On November 21, 2024, Atty. Lopez filed a Motion for Reconsideration dated November 20, 2024, of the HOR Order citing her in contempt.	Denied.

50	On November 22, 2024, Rep. Joel Chua issued an Order directing the transfer of Atty. Lopez from the HOR to the Women's Correctional Facility in Mandaluyong City	Denied.
51	Shortly after, House Legislative Security Bureau Executive Director Belinda Bello, together with police officers, attempted to enter the HOR Detention Facility where Atty. Lopez was being held to implement the aforesaid transfer Order dated November 22, 2024.	Denied.
52	On January 30, 2025, the former National Bureau of Investigation Director Judge Jaime Santiago wrote a letter addressed to Prosecutor General Richard Anthony Fadullon of the National Prosecution Service, Department of Justice, transmitting its recommendation for the prosecution of the Respondent of one (1) count of Inciting to Sedition and three (3) counts of Grave Threats.	Denied.
53	On February 5, 2025, Senior Assistant State Prosecutor Jayvee Laurence Bandong of the DOJ issued a Certification stating that the Complaint/referral from the NBI does not contain evidence to prove the essential elements of the crime, thus "insufficient for the conduct of preliminary investigation and must first be referred for case build-up".	Denied.
54	On February 11, 2025, the former NBI Director Santiago sent a Letter addressed to Prosecutor General Richard Anthony Fadullon of the NPS- DOJ, confirming that on February 10, 2025, the NBI received the Certification dated February 5, 2025 of SASP Bandong and	Denied.

	submitting a revised Affidavit of Investigation.	
55	On April 25, 2025, the DOJ Panel of Prosecutors issued a Subpoena to the respondent requiring her to appear before the panel of prosecutors and to submit her counter-affidavit on May 9 and 16, 2025 in the preliminary investigation of the complaint for Inciting to Sedition and Grave Threats titled "National Bureau of Investigation-Cybercrime Division (NBI-CCD) v. Sara Z. Duterte" and docketed as NPS Docket No. XVI-INV-25C-00048.	Denied.
56	The Complaint for Grave Threats and Inciting to Sedition against the respondent remains pending as of today.	Denied.
57	The HOR-Committee on Justice did not provide the respondent with copies of the following documents prior to the committee hearing on April 29, 2026: ANNEX: F[9] — DESCRIPTION: USB with all videos ANNEX: G[9] — DESCRIPTION: Affidavit of Investigation	Denied.
58	The documents referred to in the table above were not attached to either the Saballa or Cabrera Complaints.	Denied.

II.
ORDER OF PRESENTATION OF EVIDENCE

2.1. The Prosecution further manifests that it presently intends, for purposes of trial management, to present its evidence in support of the Articles of Impeachment in the following order:

1	**Article IV**: Assassination Plot, Grave Threats, and Inciting Sedition Against the Government
2	**Article I**: Misuse and Misappropriation of Confidential Funds
3	**Article III**: Bribery and Corruption within the Department of Education
4	**Article II**: Unexplained Wealth, False SALNs, and Continued Business Interests

2.2. The foregoing order of presentation remains subject to such modifications as the Impeachment Court may deem appropriate during the course of the proceedings. The placement of Article II is presently indicated as last but may be adjusted in the order of presentation depending on witness availability and other related considerations, subject in all cases to prior approval of the Impeachment Court.

III.
ON THE MARKING OF COMMON EXHIBITS

3.1. The Prosecution respectfully notes, for purposes of orderly pre-trial proceedings, that during the marking of exhibits, instances were observed where identical documents identified by both parties as common exhibits were nonetheless marked separately, on the stated ground that the same documents would be offered for different purposes.

3.2. This practice has resulted in the repeated marking of identical documents under different designations, thereby creating avoidable duplication in the record of exhibits. The Prosecution respectfully observes that the function of marking is to identify exhibits for purposes of record and reference, and not to predetermine or restrict the distinct purposes for which the same document may later be offered during trial.

3.3. While the Prosecution fully respects the autonomy of the parties in the presentation of their respective evidence, it respectfully submits that joint marking of identical documents may

better serve the objectives of efficiency, clarity, and orderly trial management, without prejudice to the respective purposes for which such exhibits may ultimately be offered in evidence.

IV.
OBSERVATION AND
REQUEST FOR SPECIFICATION

4.1. The Prosecution furthermore brings to the Impeachment Court's attention that respondent's Pre-Trial Brief includes a very large number of proposed witnesses and documentary exhibits, many of which appear to be repetitively described using substantially identical language.

4.2. As to the proposed witnesses, a significant number are uniformly characterized as being offered "to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing."

4.3. A similar pattern is observed in respondent's list of documentary exhibits, which are likewise described in broadly uniform terms, substantially to the effect that they are offered "to disprove the allegations in the Articles of Impeachment" and "prove the material allegations in the Answer dated May 26, 2026," with minimal variation among entries.

4.4. While the Prosecution fully recognizes the right of respondent to present evidence in defense, the foregoing descriptions appear to be stated in generalized and formulaic terms, without sufficient particularization of the specific facts, issues, or elements to which each witness or document is intended to relate.

4.5. In order to assist the Impeachment Court in the proper framing of issues, avoid unnecessary duplication of evidence, and ensure orderly trial management, the Prosecution respectfully requests that respondent be directed to provide a more specific identification of the purpose, relevance, and materiality of each proposed witness and documentary exhibit.

PRAYER

WHEREFORE, premises considered, the Prosecution respectfully prays that the Honorable Impeachment Court:

(1) **NOTE** this compliance, including the Prosecution's comments on respondent's proposed stipulations;

(2) **NOTE** the Prosecution's manifestation on its intended order of presentation of evidence;

(3) **NOTE** the observation on the marking of common exhibits; and

(4) **GRANT** the Prosecution's request for specification by directing respondent to provide a more definite and particularized statement of the purpose of each proposed witness and documentary exhibit.

The Prosecution further prays for such further or other reliefs as may be deemed just and equitable.

Quezon City for Pasay City, June 22, 2026.

THE PUBLIC PROSECUTORS
FOR THE IMPEACHMENT CASE AGAINST
VICE PRESIDENT SARA ZIMMERMAN DUTERTE
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